

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 2419  
Master Docket No. 1:13-md-2419-RWZ

THIS DOCUMENT RELATES TO:

All Cases

**JOINT STIPULATION FOR EXTENSION OF TIME FOR INVOKING  
DEFENDANTS TO RESPOND TO ST. THOMAS ENTITIES' MOTION TO COMPEL**

Pursuant to Section A of MDL Order No. 11 (MDL No. 1524), the St. Thomas Entities<sup>1</sup> ("St. Thomas") and Barry Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro and Glenn Chin (the "Invoking Defendants") hereby stipulate jointly as follows:

1. On July 30, 2015, St. Thomas filed a Motion to Compel Invoking Defendants to Produce Certain Documents (the "Motion") (MDL No. 2117). On August 13, 2015, the Invoking Defendants filed a Joint Stipulation for an extension of time to file the response. The extension was through August 28, 2015.
2. At the Invoking Defendants request, St. Thomas agreed that the Invoking Defendants' response(s) to the Motion may be filed on or before Wednesday September 2, 2015.<sup>2</sup>

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<sup>1</sup> Saint Thomas Health, Saint Thomas Network, and Saint Thomas West Hospital, formerly known as St. Thomas Hospital.

<sup>2</sup> On July 31, 2015, Defendants BKC Pain Specialists, Inc., Cincinnati Pain Management Consultants, Ltd., APAC Centers for Pain Management/Advanced Pain Anesthesia Consultants, P.C., James Molnar, M.D., Gururau Sudarshan, M.D., Anne Tuttle, M.D., Saud Siddiqui, M.D., Lori Sheets, LPN, Meena Chadha, Randolph Chang, M.D., Adil Katabay, M.D., and Nikesh Batra, M.D. ("Ohio Clinic Defendants") filed a Motion to Join the St. Thomas Motion. (MDL No. 2126.) The Ohio Clinic Defendants are Impacted Parties under MDL Order No. 11, and counsel for those defendants has been notified of this extension.

Dated: August 31, 2015

Respectfully submitted,

(For the Invoking Defendants)

GREGORY CONIGLIARO

By his attorneys,

/s/ Dan Rabinovitz

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\*Appearing *Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2015, a true copy of the foregoing was filed in accordance with the Court's Electronic Filing Guidelines and will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Dan Rabinovitz  
Dan Rabinovitz, Esq.